

REMARKS

The Office Action mailed July 1, 2008 has been received and its contents carefully considered. Reconsideration and withdrawal of the outstanding rejections are respectfully requested in view of the foregoing amendments and the following remarks.

Claims 28, 30 and 32-34 were rejected as being unpatentable over Veyrat in view of Succop and further in view of Martin. This rejection is respectfully traversed.

Without conceding the propriety of the rejection, each of the independent claims has been amended to recite that the input shaft of the pump assembly and the output element of the motor drive assembly are detachably mateable and that this detachable mating is accomplished via a male/female connection. These features are supported at least in paragraph [0029] of the present specification, which describes a hollow female final gear of the gear box which is part of the motor drive, and a projecting or male shaft which is the input shaft of the pump assembly.

Reference is now made to the remarks that have been previously provided in previous amendments to this application. These remarks are incorporated by reference herein. All of these prior remarks will not be repeated in detail here, for conciseness. However, Applicant notes that a benefit of some embodiments of the present invention is that the motor drive assembly can be readily and conveniently detached from the pump assembly and the adapter. This can be especially advantageous when servicing or repairing the entire system; because it is often necessary to remove the motor from the pump. A difficulty with the prior art was that when reattaching a motor it was sometimes difficult to accomplish alignment between the output shaft of the motor drive assembly and the input shaft of the pump. In order to accommodate misalignment, a flexible coupling would often be needed which would add to the complexity cost and effort of re-installing a motor drive assembly.

The invention recited in the present amended claims uses a novel and unobvious structure to accomplish an improved arrangement, wherein a male and female connection is put into satisfactory alignment by means of an adapter disposed between the pump and the motor drive assembly. On the pump side of the adapter, bolts and alignment pins are used; this attachment is an attachment that rarely needs to be disassembled in use, and thus a semi-permanent connection between the adapter and the pump assembly is provided. However, on the other side of the adapter, where it is more frequently required to remove and replace or exchange a motor drive assembly, a different alignment arrangement is used. This is often a more frequent operation performed by an operator, the motor drive assembly features a projecting nose which is received in a complementary circular groove in the adapter. Registration pins are avoided by provision of the nose and groove at this juncture.

The arrangement described above avoids the needs for undesirable additional structure in the adapter area. For example, there is no need for the adapter to contain internal bearings to support a shaft. Furthermore, in the instances where it is desirable to remove the adapter from the pump, the adapter can be removed without any need to disassemble the pump.

Turning to the references used in the rejection, the Examiner is thanked for the explanation of what aspects of the references are being used in the rejection. However, Applicant respectfully traverses this rejection and respectfully requests reconsideration in light of the foregoing amendments and the following remarks.

Turning first to Veyrat, at Fig. 3 Veyrat discloses a structure where the output shaft 48 of the motor is joined by welding to the pump rotor input shaft 51. Clearly, Veyrat did not contemplate any removal or replacement of the motor, since this would require destruction of the weld joint of the shaft. Further, Veyrat had no need to provide or suggest any detachable

alignment between the motor drive and the pump, since the welded shaft would inherently align itself.

The implication that Veyrat did not contemplate removing the motor drive assembly from the adapter is further buttressed by the fact that the bolts 42 (which attach the motor drive to the support 40 relied on in the Office Action as allegedly corresponding to the recited adapter) appear to also be the arrangement by which the support 40 is attached to the pump of Veyrat itself. That is, Veyrat clearly does not contemplate any situation where the motor could be removed from the support, without also causing the support to come apart from the pump. Moreover, since the motor output and pump input shafts of Veyrat are welded together, clearly this was a permanent installation once put in the configuration of Fig. 3.

Therefore, it is respectfully submitted that Veyrat is completely silent not only with respect to the presently recited detachable male/female coupling of the shafts, but further in no way suggests applying the features of the secondary references, since they would serve no purpose whatsoever in the Veyrat system. It is further submitted that the secondary references, while in no way being compatible with Veyrat, further do not provide the missing features with respect to the claim system in any event.

For example, Succop also does not show a male/female connection. To the contrary, Succop shows a gear train inside of a gear case 20 (with the Office Action relying on the gear case 20 as corresponding to the claimed adapter). Succop therefore does not show a male/female connection, nor does it show the recited registration pins. Further, it is not even clear how one would remove what is alleged to be the motor drive system 10 from the gear case 20 of Succop without somehow removing the gear 54. Finally, it is clear that Succop also does not relate to a

detachable system, nor alignment of a detachable system and thus cannot remedy the deficiencies in Veyrat.

Turning to Martin, Martin discloses two embodiments, one where a motor magnetically drives a shaft, and another in Fig. 8 where bifurcated end 63 and arms 64 push against each other as part of a drive system. Again, neither a magnetic drive system nor an interlocking arm drive system are concerned with providing alignment. To the contrary, both systems accept some degree of misalignment. Therefore, nothing in the Succop reference suggests using a projecting nose for alignment, nor using registration pins for alignment, and thus not surprisingly Martin is completely silent with respect to these elements.

The Office Action is believed to be relying on Martin solely for disclosing a base attached to an item that could be considered by the Examiner as an adapter. However, the item identified as allegedly corresponding to the adapter body of Martin is not even an item with a reference number, but rather is a “can” taken in combination with a part 16. The “can” and portion 16 have no other features in common with the claimed adapter (other than being interposed between a motor and a pump). Therefore, when taken as a whole and in context, it is respectfully submitted that Martin does not even suggest the claimed base arrangement, and even if it did has no suggestion to be combined with the proposed hypothetical modified references being used otherwise in the rejection.

Turning finally to Klauck, in this reference the rejection takes a single unitary component 3 and contends that one “part” of this single unitary component actually corresponds to the claimed motor and drive assembly, and another “part” of this unitary component somehow corresponds to the claimed adapter. First, this does not track the claim elements. Second, there is nothing about the item 3 or the portion 20 being relied on as an adapter that has anything in

common with the claimed adapter, other than being part of a structure in between a motor and a pump. Klauck clearly calls out a holder 14 which appears to be inside of the wall 20 (which the Office Action is understood to contend as corresponding to the adapter). The Office Action does not point to any alignment features or detachability whatsoever, and indeed Klauck does not suggest them. Thus, it is respectfully submitted that one would not look to this reference in order to modify the others, and even if they did the entire claimed combination is in no way suggested.

Klauck is used in the rejection of dependent claims 31 and 35, which relate to the input shaft extending through the adapter without any bearing support from the adapter. This stands in stark contrast to the overall combination proposed by the Examiner. In Veyrat, a bearing is provided by the item 40 which the Examiner alleges corresponds to the claimed adapter. In Succop multiple bearings and a gear train are provided within the item 20 identified by the Examiner as allegedly corresponding to the claimed adapter. In Martin, brackets and flanges appear to support the pump input shaft, and in any event were it considered, arguendo, that the shafts are unsupported within the "can", then it is respectfully submitted that this reference is significantly deficient in that it has no need for alignment due to the type of coupling used therein, and accordingly does not describe alignment.

Therefore, full consideration of these dependent claims separately is respectfully requested.

Application No.: 10/687,616  
Docket No.: 87358.2160

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CONCLUSION

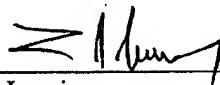
In view of the foregoing, reconsideration and allowance of the application are believed in order. Such action is earnestly solicited.

Should the Examiner believe that a telephone conference would expedite issuance of the application, the Examiner is respectfully invited to telephone the undersigned attorney at (202) 861-1696.

Any extension of time necessary to prevent abandonment is hereby requested, and any fee necessary for consideration of this response is hereby authorized to be charged to Deposit Account No. 50-2036.

Respectfully submitted,

**BAKER & HOSTETLER LLP**

  
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